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April 21, 2000

VIA EMAIL & FIRST-CLASS MAIL

David A. Rabbino, Esq. U.S. Environmental Protection Agency 75 Hawthorne Street San Francisco, CA 94105

Re: Omega Chemical Site De Minimus Settlement

Dear Mr. Rabbino:

As I understand you are aware, our clients (Pilkington) Swedlow Aerospace and Pilkington Barnes Hind have elected to participate in the de minimus settlement for the Omega Chemical Site currently being negotiated with your office. The Steering Committee of OPOG has notified us that parties which have not executed the OPOG Consent Decree by April 21, 2000 "and do not provide a recognized valid reason to EPA by that date, run the risk of being deemed recalcitrant in connection with the Site." Pursuant to your discussions with Peter McGaw on this subject, it is appropriate that our clients not be deemed recalcitrant in light of their participation in the de minimus settlement.

Please call me immediately if you differ with our conclusion regarding this matter. Thank you for your attention to this matter.

Very truly yours,

Philip J. Pogledich